

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Federal-State Joint Board)
Universal Service)

CC Docket No. 96-45

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AMERITECH'S FURTHER COMMENTS ON COST MODELS

In response to the Common Carrier Bureau's request, Ameritech respectfully offers these further comments on the four cost models which are referenced in the Public Notice released in this docket on July 10, 1996.¹ These models are the Benchmark Cost Model ("BCM") and the Cost Proxy Model ("CPM") which were prepared for CC Docket No. 80-286, and the Benchmark Cost Model 2 ("BCM2") and the Hatfield 2.2, Release 1 ("Hatfield model") which were prepared last month for this docket.

At this time, Ameritech does not support the use of any of these proxy models for administering universal service support, but continues to support

¹ Ameritech already has filed extensive comments and reply comments on the Notice of Proposed Rulemaking released in this docket on March 8, 1996. In addition, Ameritech filed answers to the 72 additional questions posed by the Common Carrier Bureau in the Public Notice released in this docket on July 3, 1996.

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the use of actual wire center costs² in conjunction with the affordability benchmark mechanism Ameritech discussed in comments it filed earlier in this docket.³ Under Ameritech's recommended approach, eligible local exchange carriers would get universal service support, when their costs for "core" services exceed the affordability benchmark rate,⁴ for the difference between: (a) the benchmark rate and their actual cost for "core" services, or (b) their actual rate and their actual cost for "core" services, whichever is less. This approach does not subsidize that portion of a carriers' revenue shortfall which is attributable to an unreasonably low rate for "core" services, nor does it allow for a subsidy when "core" rates are compensatory.

It must be remembered that actual book cost is the standard against which proxy models are evaluated. If the results of a proxy model replicate actual book cost, the model is touted as being "accurate." To the extent a proxy model does not replicate actual book cost, the model is "refined" in order to produce results which are closer to the actual book cost. Given this standard, it is not entirely clear why the Commission does not simply adopt actual book cost as the starting point for administering universal service

² Wire center costs should be used because the wire center is the basis upon which network costs are incurred.

³ E.g. In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Ameritech Comments, filed April 12, 1996 at pp. 10-11.

⁴ The affordability benchmark rate could be based, for example, on statewide average rates or costs for "core" services or a specified percentage of statewide median income.

support subject, however, to the affordability benchmark mechanism Ameritech has proposed.⁵

The record in this docket may ultimately support the use of a proxy cost model for administration of universal service support. If and when that showing is made, Ameritech would support the use of a proxy cost model to identify high cost areas, but would not support its use to size the universal service fund or to set prices for services. Yet, until a systematic evaluation of the cost models is undertaken and the results are put on the record for public review and comment,⁶ Ameritech continues to recommend the use of actual wire center costs and the affordability benchmark mechanism.

None of the cost models referenced in the July 10, 1996 Public Notice should, or even can, be adopted at this time. The BCM has been replaced by the BCM2 and, accordingly, the BCM should no longer be the subject of

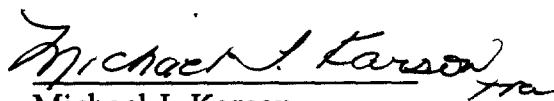
⁵ Some have argued that use of a proxy model is better than actual book cost because a model is easier and more convenient to administer. Yet, the best evidence to the contrary is the debate raging in this docket and throughout the industry over the various proxy models identified to-date.

⁶ There are potential procedural and substantive due process issues associated with the manner in which the public has been asked to comment on the proxy models identified in this docket. Basically, parties are told to contact the company sponsoring a model, spend tens of thousands of dollars to purchase the model and the hardware/software necessary to run the model, figure out the logic of the model and the associated inputs including the changes in the model as it has been updated over time, run the model, evaluate the results, and then prepare comments on the model -- all within a matter of weeks. It would seem that if the Commission is going to adopt a proxy model for purposes of administering universal service support, the Commission first would require that the model itself and the nationwide results of its use would be put on the record for public review and comment.

continued debate. The BCM2 and the CPM are currently being reviewed by an industry group convened under the auspices of the United States Telephone Association ("USTA"), but the first meeting of that group was held on July 29-30, 1996 and no results have been achieved at this time.

To the extent results are in on the Hatfield model, they show serious deficiencies. Many of those deficiencies are noted in: the Timothy J. Tardiff economic evaluation submitted by GTE in its June 27, 1996 ex parte statement in CC Docket No. 96-98; the R.G. Harris affidavit submitted by U S West in its reply comments in CC Docket No. 96-98; and the Strategic Policy Research Comments submitted by BellSouth in its reply comments in CC Docket No. 96-98. Those deficiencies also have been noted in the investment community.⁷ The Commission should incorporate by reference all of these reports into the record here and reject the Hatfield model for purposes of administering universal service support.

Respectfully submitted,



Michael J. Karson
Attorney for Ameritech
Room 4H88
2000 West Ameritech Center Drive
Hoffman Estates, IL. 60196-1025
847-248-6082

August 9, 1996

⁷ Anna-Maria Kovacs, Focus on the Federal Communications Commission, Janney Montgomery Scott, Industry Update July 8, 1996.

CERTIFICATE OF SERVICE

I, Edith Smith, do hereby certify that a copy of Ameritech's Further Comments has been served on the parties listed on the attached service list, via first class mail, postage prepaid, on this 9th day of August, 1996.

By: Edith Smith
Edith Smith

ROGER HAMILTON CHAIRMAN
RON EACHUS COMMISSIONER
JOAN H SMITH COMMISSIONER
OREGON PUBLIC UTILITY COMMISSION
550 CAPITOL STREET NE
SALEM OR 97310-1380

ANNE U MAC CLINTOCK
VICE PRESIDENT
REGULATORY AFFAIRS & PUBLIC POLICY
THE SOUTHERN NEW ENGLAND
TELEPHONE COMPANY
227 CHURCH STREET
NEW HAVEN CT 06510

THOMAS M. BENEDICT COMMISSIONER
REGINALD J SMITH COMMISSIONER
MICHAEL J KENNEY COMMISSIONER
STATE OF CONNECTICUT DEPT OF
PUBLIC UTILITY CONTROL
ONE CENTRAL PARK PLAZA
NEW BRITAIN CT 06051

THOMAS E TAYLOR
JACK B HARRISON
ATTORNEYS FOR
CINCINNATI BELL TELEPHONE COMPANY
FROST & JACOBS
2500 PNC CENTER
201 EAST FIFTH STREET
CINCINNATI OH 45202

RICHARD A ASKOFF
ATTORNEY FOR
NATIONAL EXCHANGE CARRIER
ASSOCIATION INC
100 SOUTH JEFFERSON ROAD
WHIPPANY NJ 07981

MARY MC DERMOTT
LINDA KENT
CHARLES D COSSON
ATTORNEYS FOR
THE UNITED STATES TELEPHONE ASSOC
1401 H STREET NW SUITE 600
WASHINGTON DC 20005

J. MAURICE TRAVILLIAN ASSISTANT
STATE SUPERINTENDENT FOR LIBRARIES
MARYLAND STATE DEPT OF EDUCATION
DIVISION OF LIBRARY AND SERVICES
200 W BALTIMORE STREET
BALTIMORE MD 21201

B B KNOWLES
DIRECTOR/UTILITIES DIVISION
GEORGIA PUBLIC SERVICE COMMISSION
244 WASHINGTON STREET SW
ATLANTA GA 30334-5701

RAYMOND G BENDER JR
J G HARRINGTON
ATTORNEYS FOR
VANGUARD CELLULAR SYSTEMS INC
DOW LOHNES & ALBERTSON
SUITE 800
1200 NEW HAMPSHIRE AVENUE NW
WASHINGTON DC 20037

JEANNE CRISP
WASHINGTON STATE LIBRARY
P O BOX 42460
OLYMPIA WA 98504-2460

NICHOLAS P MILLER
WILLIAM MALONE
MATTHEW C AMES
ATTORNEYS FOR
THE JOINT COMMENTERS
MILLER CANFIELD PADDOCK AND STONE
1225 NINETEENTH STREET NW SUITE 400
WASHINGTON DC 20036-2420

JAN F REIMERS
PRESIDENT
ICORE INC
326 S SECOND STREET
EMMAUS PA 18049

KENNETH T BURCHETT
VICE PRESIDENT
GVNW INC/MANAGEMENT
P O BOX 230399
PORTLAND OR 97281-0399

DEBORAH C COSTLOW
TREG TREMONT
ATTORNEYS FOR
INDEPENDENT CABLE &
TELECOMMUNICATIONS ASSOCIATION
WINSTON & STRAWN
1400 L STREET NW
WASHINGTON DC 20005

DAVID PRICE
PRESIDENT
CALIFORNIA LIBRARY ASSOCIATION
717 K STREET SUITE 300
SACRAMENTO CA 95814-3477

ROBERT BOCHER
TECHNOLOGY CONSULTANT
STATE OF WISCONSIN DEPARTMENT OF
PUBLIC INSTRUCTION
P O BOX 7841
MADISON WI 53707-7841

M ROBERT SUTHERLAND
RICHARD M SBARATTA
REBECCA M LOUGH
ATTORNEYS FOR
BELLSOUTH CORPORATION
BELLSOUTH TELECOMMUNICATIONS INC
1155 PEACHTREE STREET NE SUITE 1700
ATLANTA GA 30309-3610

ROBERT M LYNCH
DURWARD D DUPRE
MICHAEL J ZPEVAK
DARRYL W HOWARD
ATTORNEYS FOR
SOUTHWESTERN BELL TELEPHONE CO
ONE BELL CENTER SUITE 3524
ST. LOUIS MO 63101

KATHRYN MARIE KRAUSE
ATTORNEY FOR
U S WEST INC
SUITE 700
1020 19TH STREET NW
WASHINGTON DC 20036

LAWRENCE W KATZ
ATTORNEY FOR
THE BELL ATLANTIC TELEPHONE
COMPANIES
1320 NORTH COURT HOUSE ROAD
EIGHTH FLOOR
ARLINGTON VA 22201

CHRIS FRENTROP
SENIOR REGULATORY ANALYST
MCI TELECOMMUNICATIONS
CORPORATION
1801 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20036

RAY TAYLOR
PRESIDENT
ASSOCIATION OF COMMUNITY COLLEGE
TRUSTEES
1740 N STREET NW
WASHINGTON DC 20036

DAVID PIERCE
PRESIDENT
AMERICAN ASSOCIATION OF
COMMUNITY COLLEGES
ONE DUPONT CIRCLE NW SUITE 410
WASHINGTON DC 20036

GENEVIEVE MORELLI
VICE PRESIDENT AND GENERAL
COUNSEL
THE COMPETITIVE
TELECOMMUNICATIONS ASSOCIATION
SUITE 220
1140 CONNECTICUT AVENUE NW
WASHINGTON DC 20036

BRAD E MUTSCHELKNAUS
STEVEN A AUGUSTINO
ATTORNEYS FOR
THE COMPETITIVE
TELECOMMUNICATIONS ASSOCIATION
KELLEY DRYE & WARREN
1200 NINETEENTH STREET NW SUITE 500
WASHINGTON DC 20036

MARGOT SMILEY HUMPHREY
ATTORNEY FOR
CENTURY TELEPHONE ENTERPRISES INC
AND TDS TELECOMMUNICATIONS CORP
KOTEN & NAFTALIN LLP
SUITE 1000
1150 CONNECTICUT AVENUE NW
WASHINGTON DC 20036

RICHARD MCKENNA HQE03J36
ATTORNEY FOR
GTE SERVICE CORPORATION
P O BOX 152092
IRVING TX 75015-2092

GAIL L POLIVY
ATTORNEY FOR
GTE SERVICE CORPORATION
1850 M STREET NW SUITE 1200
WASHINGTON DC 20036

MICHAEL S FOX
DIRECTOR REGULATORY AFFAIRS
JOHN STAURULAKIS INC
6315 SEABROOK ROAD
SEABROOK MD 20706

BONNIE PRICE
TEACHER
7027 HAVERHILL PARK ROAD
WHITTIER CA 90602

HONORABLE ALBERT VANN CHAIRMAN
THE NATIONAL BLACK CAUCUS OF
STATE LEGISLATORS
TELECOMMUNICATIONS & ENERGY
COMMITTEE
LEGISLATIVE OFFICE BUILDING #422
ALBANY NY 12248

ROBERT A HART IV
HART ENGINEERS
4615 NORTH BOULEVARD
BATON ROUGE LA 70806

MICHAEL T SKRIVAN
HARRIS SKRIVAN & ASSOCIATES LLC
8801 S YALE SUITE 220
TULSA OK 74137

MICHAEL C STRAND
EXECUTIVE VICE PRESIDENT AND
GENERAL COUNSEL
MONTANA INDEPENDENT
TELECOMMUNICATIONS SYSTEMS INC
519 N SANDERS P O BOX 5237
HELENA MT 59604-5237

MARC A STONE
MANAGER REGULATORY/LEGISLATIVE
AFFAIRS
FRED WILLIAMSON & ASSOCIATES INC
2921 EAST 91ST STREET SUITE 200
TULSA OK 74137-3300

NICHOLAS P MILLER
WILLIAM MALONE
MATTHEW C AMES
ATTORNEYS FOR NATIONAL SCHOOL
BOARDS ASSOCIATION ET AL
1225 NINETEENTH STREET NW SUITE 400
WASHINGTON DC 20036-2420

RICHARD W RILEY
U S SECRETARY OF EDUCATION
600 INDEPENDENCE AVENUE SW
WASHINGTON DC 20202-0100

CHARLES H KENNEDY
ATTORNEY FOR
THE WESTERN ALLIANCE
MORRISON & FOERSTER LLP
SUITE 5500
2000 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20006

HENRY GOLDBERG
W KENNETH FERREE
ATTORNEYS FOR
OPTEL INC
GOLDBERG GODLES WIENER & WRIGHT
1229 NINETEENTH STREET NW
WASHINGTON DC 20036

KEVIN J DONNELLAN ACTING DIRECTOR
AMERICAN ASSOCIATION OF RETIRED
PERSONS
601 E STREET NW
WASHINGTON DC 20049

BRADLEY C STILLMAN ESQ DIRECTOR
TELECOMMUNICATIONS POLICY
DR MARK N COOPER DIRECTOR OF
RESEARCH
CONSUMER FEDERATION OF AMERICA
1424 16TH STREET NW SUITE 604
WASHINGTON DC 20036

VERONICA M AHERN
ATTORNEY FOR
GUAM TELEPHONE AUTHORITY
NIXON HARGRAVE DEVANS & DOYLE
LLP
ONE THOMAS CIRCLE SUITE 700
WASHINGTON DC 20005

JAY SANDERS MD
PRESIDENT
AMERICAN TELEMEDICINE ASSOCIATION
901 15TH STREET NW
WASHINGTON DC 20036

RICHARD B BULMAN
SENIOR VICE PRESIDENT
RURAL TELEPHONE FINANCE
COOPERATIVE
2201 COOPERATIVE WAY
HERNDON VA 22071

PAUL RODGERS GENERAL COUNSEL
CHARLES D GRAY ASSISTANT GENERAL
COUNSEL
NATIONAL ASSOCIATION OF
REGULATORY UTILITY COMMISSIONERS
P. O. BOX 684
1201 CONSTITUTION AVENUE SUITE 1102
WASHINGTON DC 20044

DAN MORALES ATTORNEY GENERAL
JORGE VEGA FIRST ASSISTANT
ATTORNEY GENERAL
THE TEXAS ADVISORY COMMISSION ON
STATE EMERGENCY COMMUNICATIONS
P. O. BOX 12548 CAPITOL STATION
AUSTIN TX 78711-2548

MARY E NEWMAYER
FEDERAL AFFAIRS ADVISOR
ALABAMA PUBLIC SERVICE COMMISSION
P O BOX 991
MONTGOMERY AL 36101

JEFFREY P JOHNSON
DEPUTY STATE LIBRARIAN
LIBRARY OF MICHIGAN
717 W ALLEGAN STREET
LANSING MI 48909

J MANNING LEE
VICE PRESIDENT REGULATORY AFFAIRS
TELEPORT COMMUNICATIONS GROUP
INC
TWO TELEPORT DRIVE SUITE 300
STATEN ISLAND NY 10311

ROBERT G PENNINGTON PROGRAM
DIRECTOR
MOUNTAINEER DOCTOR TELE VISION-
MDTV
ROBERT C BYRD HEALTH SCIENCES
CENTER
WEST VIRGINIA UNIVERSITY
MORGANTOWN VA 26506

CAROL C HENDERSON
EXECUTIVE DIRECTOR
AMERICAN LIBRARY ASSOCIATION
WASHINGTON OFFICE
SUITE 403
1301 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20004

MARGO CRIST
CHAIR COMMITTEE ON NII/TELECOM
MICHIGAN LIBRARY ASSOCIATION
UNIVERSITY OF MICHIGAN
LIBRARY ADMINISTRATION
818 HATCHER SOUTH
ANN ARBOR MI 48109-1205

MONROE E PRICE
PROFESSOR OF LAW
BENJAMIN N CARDOZO SCHOOL OF LAW
BROOKDALE CENTER
55TH AVENUE
NEW YORK NY 10003

NANCY J SHARP MSN RN
EXECUTIVE VICE PRESIDENT
AMERICAN COLLEGE OF NURSE
PRACTITIONERS
SUITE 350
2401 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20037-1718

JOSEPH A SPANGNOLO
STATE SUPERINTENDENT OF EDUCATION
ILLINOIS STATE BOARD OF EDUCATION
100 NORTH FIRST STREET
SPRINGFIELD IL 62777-0001

RANDALL E CAPE
LUCILLE M MATES
NANCY C WOOLF
ATTORNEY FOR
PACIFIC TELESIS GROUP
ROOM 1523
140 NEW MONTGOMERY STREET
SAN FRANCISCO CA 94105

MARGARET E. GARBER
ATTORNEY FOR
PACIFIC TELESIS GROUP
1275 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20004

LINDA L KENT
ASSOCIATE GENERAL COUNSEL
UNITED STATES TELEPHONE
ASSOCIATION
1401 H STREET NW SUITE 600
WASHINGTON DC 20005-2164

DELBERT D SMITH
STEFAN M LOPATKIEWICZ
BRIGITTE L ADAMS
ATTORNEYS FOR
U S DISTANCE LEARNING ASSOCIATION
REED SMITH SHAW & MCCLAY
1301 K STREET NW EAST TOWER
WASHINGTON DC 20005

JEFFREY F BECK
JILLISA BRONFMAN
ATTORNEYS FOR
EVANS TELEPHONE COMPANY ET AL
BECK & ACKERMAN
FOUR EMBARCADERO CENTER SUITE 760
SAN FRANCISCO CA 94111

PATRICE MC DERMOTT
INFORMATION POLICY ANALYST
OBM WATCH
1742 CONNECTICUT AVENUE NW
WASHINGTON DC 20009-1171

RANDY ZACH
TCA INC
3617 BETTY DRIVE SUITE I
COLORADO SPRINGS CO 80917

DAVID W MC GANN
SPECIAL ASSISTANT ATTORNEY GENERAL
ILLINOIS COMMERCE COMMISSION
160 NORTH LASALLE STREET
CHICAGO IL 60601

MARILYN MOHRMAN-GILLIS
VP OF POLICY & LEGAL AFFAIRS
LONNA M THOMPSON
DIRECTOR LEGAL AFFAIRS
ASSOCIATION OF AMERICA'S PUBLIC
TELEVISION STATIONS
SUITE 200
1350 CONNECTICUT AVENUE NW
WASHINGTON DC 20036

PETER ARTH JR
EDWARD W O'NEILL
MARY MACK ADU
ATTORNEYS FOR
THE PEOPLE OF THE STATE OF
CALIFORNIA/THE PUC OF THE STATE OF
CALIFORNIA
505 VAN NESS AVENUE
SAN FRANCISCO CA 94102

JOE D EDGE
RICHARD J ARSENAULT
ATTORNEYS FOR
PUERTO RICO TELEPHONE COMPANY
DRINKER BIDDLE & REATH
901 FIFTEENTH STREET NW
WASHINGTON DC 20005

ALFRED M MAMLET
PHILIP L MALET
MARC A PAUL
ATTORNEYS FOR
TELEFONICA LARGA DISTANCIA
STEPTOE & JOHNSON LLP
1330 CONNECTICUT AVENUE NW
WASHINGTON DC 20036

LAURIE PAPPAS
DEPUTY PUBLIC COUNSEL
TEXAS OFFICE OF PUBLIC UTILITY
COUNSEL
SUITE 290-E
7800 SHOAL CREEK BOULEVARD
AUSTIN TX 78757

JOEL BLAU DIRECTOR-UTILITY
INTERVENTION
DOUGLAS W ELFNER UTILITY
INTERVENOR
ANN KUTTER DEPUTY EXECUTIVE
DIRECTOR
NYS CONSUMER PROTECTION BOARD
99 WASHINGTON AVENUE SUITE 1020
ALBANY NY 12210

DON SCHROER
CHAIRMAN
ALASKA PUBLIC UTILITIES COMMISSION
1016 WEST SIXTH AVENUE SUITE 400
ANCHORAGE AK 99501-1963

TERRY D. BLACKWOOD
BILLY JACK GREGG
WEST VIRGINIA CONSUMER ADVOCATE
700 UNION BUILDING
CHARLESTON WV 25301

MARK D WILKERSON ESQ
ATTORNEY FOR
THE ALABAMA-MISSISSIPPI TELEPHONE
ASSOCIATION
BRANTLEY & WILKERSON PC
P O BOX 830
MONTGOMERY AL 36101-0830

ROBERT J SACHS
HOWARD B HOMONOFF
CONTINENTAL CABLEVISION INC
LEWIS WHARF PILOT HOUSE
BOSTON MA 02110

BRENDA L FOX
CONTINENTAL CABLEVISION INC
1320 19TH STREET NW SUITE 201
WASHINGTON DC 20036

HOWARD J SYMONS
JENNIFER A PURVIS
ATTORNEYS FOR
CONTINENTAL CABLEVISION INC
SUITE 900
701 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20004

BENJAMIN PEREZ
GERALD M ZUCKERMAN ESQ
MARK J BECKER ESQ
HISPANIC INFORMATION AND
TELECOMMUNICATIONS NETWORK INC
ABACUS COMMUNICATIONS COMPANY
1801 COLUMBIA ROAD NW SUITE 101
WASHINGTON DC 20009

TOM UDALL
NEW MEXICO ATTORNEY GENERAL
RICHARD WEINER
ASSISTANT ATTORNEY GENERAL
THE NEW MEXICO ATTORNEY GENERAL
P O DRAWER 1508
SANTA FE NM 87504

THOMAS K CROWE
MICHAEL B ADAMS JR
ATTORNEYS FOR
THE COMMONWEALTH OF THE
NORTHERN MARIANA ISLANDS
LAW OFFICES OF THOMAS K CROWE PC
2300 M STREET NW SUITE 800
WASHINGTON DC 20037

ILLONA A JEFFCOAT-SACCO
DIRECTOR PUBLIC UTILITIES DIVISION
THE NORTH DAKOTA PUBLIC SERVICE
COMMISSION
STATE CAPITOL
600 E BOULEVARD
BISMARCK ND 58505-0480

MICHAEL CASSERLY EXECUTIVE
DIRECTOR
COUNCIL OF THE GREAT CITY SCHOOLS
SUITE 702
1301 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20004

MICHAEL J NOWICK
EXECUTIVE SECRETARY/TREASURER
MINNESOTA TELEPHONE ASSOCIATION
1650 WORLD TRADE CENTER
30 EAST 7TH STREET
ST PAUL MN 55101-4901

KENNETH LEIN
MANAGER
WINNEBAGO COOPERATIVE TELEPHONE
ASSOCIATION
704 EAST MAIN
LAKE MILLS IA 50450

JUDITH ST LEDGER-ROTY
STEFAN M LOPATKIEWICZ
ATTORNEYS FOR
REED SMITH SHAW & MCCLAY
1301 K STREET NW EAST TOWER
WASHINGTON DC 20005

ANDREA M KELSEY
DAVID C BERGMANN
RICHARD W PACE ASSIST CONSUMERS'
COUNSEL
OFFICE OF THE OHIO CONSUMERS'
COUNCIL
77 SOUTH HIGH STREET 15TH FLOOR
COLUMBUS OH 43266-0550

ANGELA J CAMPBELL
ILENE R PENN
JOHN PODESTA
INSTITUTE FOR PUBLIC REPRESENTATION
GEORGETOWN UNIVERSITY LAW CENTER
600 NEW JERSEY AVENUE NW
WASHINGTON DC 20001

KATHERINE GRINCEWHICH
OFFICE OF THE GENERAL COUNSEL
UNITED STATES CATHOLIC CONFERENCE
3211 4TH STREET NE
WASHINGTON DC 20017-1194

VIRGINIA J TAYLOR
RICHARD A ELBRECHT
ATTORNEYS FOR
CALIFORNIA DEPARTMENT OF
CONSUMER AFFAIRS
400 R STREET SUITE 3090
SACRAMENTO CA 95814-6200

RICHARD J JOHNSON
BRIAN T GROGAN
ATTORNEYS FOR
MINNESOTA INDEPENDENT COALITION
MOSS & BARNETT
4800 NORWEST CENTER
90 SOUTH SEVENTH STREET
MINNEAPOLIS MN 55402-4129

CHARLES H HELEIN
GENERAL COUNSEL
AMERICA'S CARRIERS
TELECOMMUNICATION ASSOCIATION
HELEIN & ASSOCIATES PC
8180 GREENSBORO DRIVE SUITE 700
MCLEAN VA 22101

WILLIAM H SMITH JR CHIEF
BUREAU RATE & SAFETY EVALUATION
IOWA UTILITIES BOARD
LUCAS STATE OFFICE BUILDING
DES MOINES IA 50319

DAVID A IRWIN
ATTORNEY FOR
ITCS INC
IRWIN CAMPBELL & TANNENWALD
1730 RHODE ISLAND AVENUE NW
WASHINGTON DC 20036

CHARLES H CARRATHERS III COUNSEL
VIRGINIA'S RURAL TELEPHONE
COMPANIES
HUNTON & WILLIAMS
951 EAST BYRD STREET
RICHMOND VA 23219

DR BARBARA O'CONNOR
CHAIRWOMAN
MARY GARDINER JONES
PRESIDENT
ALLIANCE FOR PUBLIC TECHNOLOGY
901 15TH STREET NW SUITE 230
WASHINGTON DC 20005

DONALD L HOWELL II
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
P O BOX 83720
BOISE ID 83720-0074

JERE W GLOVER ESQ CHIEF COUNSEL
DAVID W ZESIGER ESQ ASSIST CHIEF
COUNSEL
OFFICE OF ADVOCACY OF THE UNITED
STATES SMALL BUSINESS
ADMINISTRATION
409 THIRD STREET SW SUITE 7800
WASHINGTON DC 20416

JOSEPH S PAYKEL
ANDREW JAY SCHWARTZMAN
GIGI B SOHN
MEDIA ACCESS PROJECT
2000 M STREET NW
WASHINGTON DC 20036

JILL A. LESSER
PEOPLE FOR THE AMERICAN WAY
2000 M STREET NW
WASHINGTON DC 20036

RONALD L PLESSER
JAMES J HALPERT
MARK J O'CONNER
ATTORNEYS FOR
COMMERCIAL INTERNET EXCHANGE
ASSOCIATION
1200 19TH STREET NW SEVENTH FLOOR
WASHINGTON DC 20036

GENE P BELARDI
VICE PRESIDENT
MOBILEMEDIA COMMUNICATIONS INC
2101 WILSON BOULEVARD SUITE 935
ARLINGTON VA 22201

FIONA BRANTON
DIRECTOR OF GOVERNMENT RELATIONS
AND REGULATORY COUNSEL
INFORMATION TECHNOLOGY INDUSTRY
COUNCIL
1250 EYE STREET NW
WASHINGTON DC 20005

GARY M EPSTEIN
TERESA D BAER
MICHAEL S WROBLESKI
ATTORNEYS FOR
PACIFIC TELECOM INC
SUITE 1300
1001 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20004

MICHAEL F ALTSCHUL VICE PRESIDENT
GENERAL COUNSEL
RANDALL S COLEMAN VICE PRESIDENT
FOR REGULATORY POLICY AND LAW
CELLULAR TELECOMMUNICATIONS
INDUSTRY ASSOCIATION
1250 CONNECTICUT AVE NW SUITE 200
WASHINGTON DC 20036

US NATIONAL COMMISSION ON
LIBRARIES AND INFORMATION SCIENCE
1110 VERMONT AVENUE NW SUITE 820
WASHINGTON DC 20005-3522

DON GILBERT SENIOR VICE PRESIDENT
OF INFORMATION TECHNOLOGY
CATHY HOTKA VICE PRESIDENT OF
INFORMATION TECHNOLOGY
NATIONAL RETAIL FEDERATION
325 7TH STREET NW SUITE 1000
WASHINGTON DC 20004

MARK J GOLDEN
VICE PRESIDENT-INDUSTRY AFFAIRS
ROBERT R COHEN
PERSONAL COMMUNICATIONS
INDUSTRY ASSOCIATION
500 MONTGOMERY STREET SUITE 700
ALEXANDRIA VA 22314-1561

DONN T WONNELL
VICE PRESIDENT REGULATORY AFFAIRS
PACIFIC TELECOM INC
805 BROADWAY
VANCOUVER WA 98660

PHILIP L VERVEER
JENNIFER A DONALDSON
JENNIFER L DESMOND
ATTORNEYS FOR
CELLULAR TELECOMMUNICATIONS
INDUSTRY ASSOCIATION
1155 21ST STREET NW SUITE 600
WASHINGTON DC 20036-3384

EMILY M WILLIAMS
ASSOCIATION FOR LOCAL
TELECOMMUNICATIONS SERVICES
1200 19TH STREET NW
WASHINGTON DC 20036

MICHAEL J SHORTLEY III
ATTORNEY FOR
FRONTIER CORPORATION
180 SOUTH CLINTON AVENUE
ROCHESTER NY 14646

DALE WHITE
COMMERCIAL SERVICES MANAGER
CHURCHILL COUNTY TELEPHONE &
TELEGRAPH
P O BOX 1390
50 WEST WILLIAMS AVENUE
FALLON NV 89406

JEFFREY SHELDON
SEAN A STOKES
ATTORNEYS FOR
UTC
SUITE 1140
1140 CONNECTICUT AVENUE NW
WASHINGTON DC 20036

WILLIAM B HILL
KEYSTONE-ARTHUR TELEPHONE
COMPANY
P O BOX 240
KEYSTONE NE 69144

RACHEL B FERBER
VICE PRESIDENT ASSISTANT GENERAL
COUNSEL
360° COMMUNICATIONS COMPANY
8725 HIGGINS ROAD
CHICAGO IL 60631

RANDOLPH J MAY
TIMOTHY J COONEY
ATTORNEYS FOR
COMPUSERVE INCORPORATED
SUTHERLAND ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20004-2404

GARY MEISSNER
DIRECTOR OF MIS
OAKLAND UNIFIED SCHOOL DISTRICT
1025 SECOND AVENUE
OAKLAND CA 94606

RICHARD M TETTELBAUM
ASSOCIATE GENERAL COUNSEL
CITIZENS UTILITIES COUNSEL
1400 16TH STREET NW SUITE 500
WASHINGTON DC 20036

DAVID A BECKER ESQ
ASSISTANT ATTORNEY GENERAL
COLORADO PUBLIC UTILITIES
COMMISSION
1580 LOGAN STREET OFFICE LEVEL 2
DENVER CO 80203

DAVID R POE
YVONNE M COVIELLO
ATTORNEYS FOR
TIME WARNER COMMUNICATIONS
HOLDINGS INC
LEBOEUF LAMB GREENE & MACRAE LLP
SUITE 1200
1875 CONNECTICUT AVENUE NW
WASHINGTON DC 20009

PAUL B JONES
JANIS A STAHLHUT
DONALD SHEPHEARD
TIME WARNER COMMUNICATIONS
HOLDINGS INC
300 FIRST STAMFORD PLACE
STAMFORD CT 06902-6732

GENE DEJORDY ESQ
CHRISTOPHER JOHNSON
WESTERN WIRELESS CORPORATION
330 120TH AVENUE NE SUITE 200
BELLEVUE WA 98005

ANNE WENDLER
CONSULTANT
LINCOLN TRAIL LIBRARIES SYSTEM
1704 W INTERSTATE DRIVE
CHAMPAIGN IL 61821

ANDREW D LIPMAN
MARK SIEVERS
ATTORNEYS FOR
MFS COMMUNICATIONS COMPANY INC
SWIDLER & BERLIN CHARTERED
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

DANIEL L BRENNER
NEAL M GOLDBERG
DAVID L NICOLL
COUNSEL FOR
NATIONAL CABLE TELEVISION
ASSOCIATION INC
1724 MASSACHUSETTS AVENUE NW
WASHINGTON DC 20036

NATIONAL ASSOCIATION OF
DEVELOPMENT ORGANIZATIONS
SUITE 630
444 NORTH CAPITOL STREET NW
WASHINGTON DC 20001

ALISON M HUGHES MPA
ASSOCIATE DIRECTOR
THE UNIVERSITY OF ARIZONA
HEALTH SCIENCES CENTER
2501 EAST ELM STREET
TUCSON AZ 85716

CHERYL L PARRINO
CHAIRMAN
PUBLIC SERVICE COMMISSION OF
WISCONSIN
P O BOX 7854
610 WHITNEY WAY
MADISON WI 53707-7854

MEL ENGEL VP SPECIAL PROJECTS
BRUCE D JACOBS
JASON S ROBERTS
ATTORNEYS FOR
WAVEPHORE INC
SUITE 400
2001 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20006

BRAD E MUTSCHELKNAUS
JOHN J HEITMANN
ATTORNEYS FOR
LCI INTERNATIONAL TELECOM CORP
KELLEY DRYE & WARREN
1200 19TH STREET NW
WASHINGTON DC . 20036

BRIAN R MOIR
ATTORNEY FOR
INTERNATIONAL COMMUNICATIONS
ASSOCIATION
MOIR & HARDMAN
2000 L STREET NW SUITE 512
WASHINGTON DC 20036-4907

MARTIN AVERY
EXECUTIVE DIRECTOR
NAVAJO NATION WASHINGTON OFFICE
1101 17TH STREET NW SUITE 250
WASHINGTON DC 20036

LYNN C SILVER
EDUCATION POLICY MANAGER
APPLE COMPUTER INC
1667 K STREET NW SUITE 410
WASHINGTON DC 20006

RICHARD CIVILLE
THE CENTER FOR CIVIC NETWORKING
INC
P O BOX 53152
WASHINGTON DC 20008

DR ANN BISHOP ASSISTANT PROFESSOR
DR LEIGH ESTABROOK DEAN
GRADUATE SCHOOL OF LIBRARY AND
INFORMATION SCIENCE
UNIVERSITY OF ILLINOIS AT
URBANA/CHAMPAIGNE
501 EAST DANIEL STREET
CHAMPAIGN IL 61820

TIMOTHY R GRAHAM
ROBERT M BERGER
JOSEPH M SANDRI JR
ATTORNEYS FOR
WINSTAR COMMUNICATIONS INC
1146 19TH STREET NW
WASHINGTON DC 20036

JAMES ROWE
ALASKA TELEPHONE ASSOCIATION
4341 B STREET SUITE 304
ANCHORAGE AK 99503

KOFI ASIEDU OFORI
COUNSEL FOR
THE OFFICE OF COMMUNICATION OF THE
UNITED CHURCH OF CHRIST
2000 M STREET NW SUITE 400
WASHINGTON DC 20036

JOHN C BEACHBOARD ASSISTANT
CHARLES R MCCLURE PROFESSOR
KRISTIN R ESCHENFELDER ASSISTANT
SYRACUSE UNIVERSITY/SCHOOL OF
INFORMATION STUDIES
4-116 CENTER FOR SCIENCE & TECH
SYRACUSE NY 13244-4100

JAY C KEITHLEY
LEON M KESTENBAUM
H RICHARD JUHNKE
ATTORNEYS FOR
SPRINT CORPORATION
1850 M STREET NW SUITE 1100
WASHINGTON DC 20036

CRAIG T SMITH
ATTORNEY FOR
SPRINT CORPORATION
P O BOX 11315
KANSAS CITY MO 64112

HAROLD M THOMPSON
CHIEF OPERATING OFFICER
IOWA COMMUNICATIONS NETWORK
P O BOX 587
JOHNSTON IA 50131-0587

JEFFREY C OGDEN
MERIT ASSOCIATE DIRECTOR
THE MERIT NETWORK INC
4251 PLYMOUTH ROAD
ANN ARBOR MI 48105-2785

JEFFREY P FOLSOM LCSW JD
DIRECTOR
SOUTHWEST MONTANA
TELEPSYCHIATRY NETWORK
50 S LAST CHANCE GULCH
HELENA MT 59601

CATHERINE R SLOAN
RICHARD L FRUCHTERMAN
RICHARD S WHITT
ATTORNEYS FOR
WORLDCOM INC
SUITE 400
1120 CONNECTICUT AVENUE NW
WASHINGTON DC 20036

KATHLEEN Q ABERNATHY
DAVID A GROSS
ATTORNEYS FOR
AIRTOUCH COMMUNICATIONS INC
1818 N STREET NW
WASHINGTON DC 20036

JAMES R FORCIER
AIRTOUCH COMMUNICATIONS INC
ONE CALIFORNIA STREET 9TH FLOOR
SAN FRANCISCO CA 94111

CYNTHIA B MILLER
ASSOCIATE GENERAL COUNSEL
THE FLORIDA PUBLIC SERVICE
COMMISSION
CAPITAL CIRCLE OFFICE CENTER
2540 SHUMARD OAK BOULEVARD
TALLAHASSEE FL 32399-0850

LEE GREEN RN
CLINICAL COORDINATOR
RURAL HEALTH NETWORK
218 EAST KIOWA AVENUE
P O BOX 575
FORT MORGAN CO 80701

JAMES R HOBSON
ATTORNEY FOR
NATIONAL EMERGENCY NUMBER
ASSOCIATION
1100 NEW YORK AVENUE NW SUITE 750
WASHINGTON DC 20005-3934

WILLIAM E STANTON
EXECUTIVE DIRECTOR
NATIONAL EMERGENCY NUMBER
ASSOCIATION
P O BOX 1190
COSHOCOTON OH 43812-6190

JON R RICE MD
STATE HEALTH OFFICER
NORTH DAKOTA DEPARTMENT OF
HEALTH
600 E BOULEVARD AVENUE
BISMARCK ND 58505-0200

RICHARD A FINNIGAN
ATTORNEY FOR
OREGON INDEPENDENT TELEPHONE
ASSOC AND THE WASHINGTON
INDEPENDENT TELEPHONE ASSOC
SUITE B-1
2405 EVERGREEN PARK DRIVE SW
OLYMPIA WA 98502

B ROBERT PILLER ESQ
EXECUTIVE DIRECTOR
GERALD A NORLANDER ESQ
DEPUTY DIRECTOR
PUBLIC UTILITY LAW PROJECT OF NEW
YORK INC
39 COLUMBIA STREET
ALBANY NY 12207-271

ERIC B WITTE
ASSISTANT GENERAL COUNSEL
ATTORNEY FOR THE
MISSOURI PUBLIC SERVICE COMMISSION
P O BOX 360
JEFFERSON CITY MO 65102

HOWARD HUNT
PRESIDENT
RURAL IOWA INDEPENDENT TELEPHONE
ASSOCIATION
P O BOX 10
DIXON IA 52745

ROBERT C HETERICK JR
PRESIDENT
SUITE 600
1112 16TH STREET NW
WASHINGTON DC 20036

ROBERTA WARD
COORDINATOR
DISTANCE DELIVERY CONSORTIUM
P O BOX 2401
BETHEL AK 99559

ELIS JACOBS
COUNCIL FOR
THE EDMONT NEIGHBORHOOD
COALITION LEGAL AND SOCIETY OF
DAYTON
333 WEST FIRST STREET SUITE 500
DAYTON OH 45402

CHARLES C HUNTER
HUNTER & MOW PC
TELECOMMUNICATIONS RESELLERS
ASSOCIATION
1620 I STREET NW SUITE 701
WASHINGTON DC 20006

RODNEY L JOYCE
EDWIN N LAVERGNE
J THOMAS NOLAN
GINSBURG FELDMAN AND BRESS
CHARTERED
1250 CONNECTICUT AVENUE NW
WASHINGTON DC 20036

JACK BROWN
P O BOX 411
WALL SD 57790-0411

PAT WOOD III
ROBERT W GEE
JUDY WALSH
PUBLIC UTILITY COMMISSION OF TEXAS
7800 SHOAL CREEK BOULEVARD
AUSTIN TX 78757

DAVID A KENNEDY
DENNIS SMALL
SUPERINTENDENT OF PUBLIC
INSTRUCTION
OLD CAPITOL BUILDING
P O BOX 47200
OLYMPIA WA 98504-7200

CAROLYN PURCELL
EXECUTIVE DIRECTOR
DEPARTMENT OF INFORMATION
RESOURCES
P O BOX 13564
AUSTIN TX 78711-3564

DAVID F HEMMINGS
EXECUTIVE VICE PRESIDENT
BRITE VOICE SYSTEMS INC
7309 EAST 21ST STREET NORTH
WICHITA KS 67206

AMY E DOUGHERTY
ATTORNEY
KENTUCKY PUBLIC SERVICE COMMISSION
P O BOX 615
FRANKFORT KY 40602

RONALD K GREENHALGH
CHIEF ENGINEER
NATIONAL RURAL ELECTRIC
COOPERATIVE ASSOCIATION
4301 WILSON BOULEVARD
ARLINGTON VA 22203-1860

CURTIS T WHITE
MANAGING PARTNER
4201 CONNECTICUT AVE NW SUITE 402
WASHINGTON DC 20008-1158

JEANNE HURLEY SIMON
NCLIS CHAIRPERSON
1110 VERMONT AVENUE NW SUITE 820
WASHINGTON DC 20005-3522

WAYNE A LEIGHTON PH D
JAMES L GATTUSO
CITIZENS FOR A SOUND ECONOMY
FOUNDATION
1250 H STREET NW SUITE 700
WASHINGTON DC 20005

DR WILLIAM J TOBIN
EXECUTIVE DIRECTOR
EARLY CHILDHOOD DEVELOPMENT
CENTER LEGISLATIVE COALITION
3612 BENT BRANCH COURT
FALLS CHURCH VA 22041

DR STANLEY GARDENER
BARBARA READING
MISSOURI STATE LIBRARY
P O BOX 387
JEFFERSON CITY MO 65102

KEVIN STARR
STATE LIBRARIAN OF CALIFORNIA
LIBRARY COURT BUILDING
P O BOX 942837
SACRAMENTO CA 94237-0001

NORMAN D RASMUSEN
EXECUTIVE VICE PRESIDENT
3236 HIWAN DRIVE
EVERGREEN CO 80439

KWEISI MFUME
PRESIDENT CEO
NATIONAL ASSOCIATION FOR
ADVANCEMENT OF COLORED PEOPLE
4805 MT HOPE DRIVE
BALTIMORE MD 212115-3297

ALAN DINSMORE
SENIOR GOVERNMENTAL RELATIONS
REPRESENTATIVE
AMERICAN FOUNDATION FOR THE BLIND
GOVERNMENTAL RELATIONS GROUP
1615 M STREET NW SUITE 250
WASHINGTON DC 20036

PAUL W SCHROEDER
NATIONAL PROGRAM ASSOCIATE IN
TECHNOLOGY AND
TELECOMMUNICATIONS
AMERICAN FOUNDATION FOR THE BLIND
401 N MICHIGAN AVENUE SUITE 308
CHICAGO IL 60611

ALLEN P STAYMAN
DIRECTOR
OFFICE OF INSULAR AFFAIRS
OFFICE OF THE SECRETARY
WASHINGTON DC 20554

PAUL HOFF
GENERAL MANAGER/CEO
PARK REGION MUTUAL TELEPHONE CO
UNDERWOOD MN 56586

ROBERT C MAIER
PAUL J KISSMAN
COMMONWEALTH OF MASSACHUSETTS
BOARD OF LIBRARY COMMISSIONERS
648 BEACON STREET
BOSTON MA 02215

MAGGIE MURPHY
POLICY INTERN
300 CENTENNIAL BUILDING
ST PAUL MN 55155

WILLIAM J JANKLOW GOVERNOR
EXECUTIVE OFFICE
STATE CAPITOL
500 EAST CAPITOL
PIERRE SD 57501-5070

JIM WILLIAMS
EXECUTIVE DIRECTOR
WASHINGTON OFFICE
1112 16TH STREET NW SUITE 600
WASHINGTON DC 20036

ROBERT S TONGREN
CONSUMERS' COUNSEL
OFFICE OF THE OHIO CONSUMERS'
COUNSEL
77 SOUTH HIGH STREET 15TH FLOOR
COLUMBUS OH 43266-0550

THOMAS E SHELDON
EXECUTIVE DEPUTY COMMISSIONER OF
EDUCATION
THE NEW YORK STATE EDUCATION
DEPARTMENT
ALBANY NY 12234

KAREN FINSTAD HAMMEL
STAFF ATTORNEY
MONTANA PUBLIC SERVICE COMMISSION
1701 PROSPECT AVENUE
P O BOX 202601
HELENA MT 59601-2601

CATHY J QUINN
GENERAL MANAGER/REGULATORY
AFFAIRS
ASSOCIATED COMMUNICATIONS &
RESEARCH SERVICES INC
817 NE 63RD STREET
OKLAHOMA CITY OK 73105

TED SCHULTZ
VICE PRESIDENT FOR ADMINISTRATIVE
SERVICES
NEBRASKA ASSOC OF HOSPITALS AND
HEALTH SYSTEMS
1604 L STREET SUITE D
LINCOLN NE 68508-2509

LAWRENCE C ST BRANC
GAYLE T KELLNER ESQ
LOUISIANA PUBLIC SERVICE
COMMISSION
P O BOX 91154
BATON ROUGE LA 70821-9154

PHILIP L VERVEER
BRIAN A FINLEY
WILLKIE FARR & GALLAGHER
THREE LAFAYETTE CENTRE
1155 21ST STREET NW
WASHINGTON DC 20036

FRANK C TORRES III
EXECUTIVE DIRECTOR
WASHINGTON LIAISON OFFICE OF THE
GOVERNOR OF GUAM
444 NORTH CAPITAL STREET
WASHINGTON DC 20001

CAROL WEINHGAUS ET AL
TELECOMMUNICATIONS INDUSTRIES
ANALYSIS PROJECT
UNIVERSITY OF FLORIDA COLLEGE OF
BUSINESS ADMINISTRATION
121 MT VERNON STREET
BOSTON MA 02108

DENA S PUSKIN
DEPUTY DIRECTOR
OFFICE OF RURAL HEALTH POLICY
5600 FISHERS LANE ROOM 9-05
ROCKVILLE MD 20857

MAUREEN O HELMER
GENERAL COUNSEL
NEW YORK STATE DEPARTMENT
OF PUBLIC SERVICE
THREE EMPIRE STATE PLAZA
ALBANY NY 12223-2510

ELIZABETH A NOEL ESQ
PEOPLES COUNSEL
OFFICE OF THE PEOPLES COUNSEL
1133 15TH STREET NW SUITE 500
WASHINGTON DC 20005

O. LEE DARRINGTON
RHONDA R MAUN
909 NORTH 98TH STREET SUITE 203
OMAHA NE 68114-2508

J SCOTT SEARL ESQ
BAIRD HOLM MCEACHEN PEDERSEN
HAMANN & STRASHEIM
1500 WOODMEN TOWER
OMAHA NE 68102

JOHN G STRAND
JOHN C SHEA
DAVID A SVANDA
PUBLIC SERVICE COMMISSION
P O BOX 30221
6545 MERCANTILE WAY
LANSING MI 48909-7721

ROBERT F MANIFOLD
ASSISTANT ATTORNEY GENERAL
PUBLIC COUNSEL SECTION OFFICE OF
ATTORNEY GENERAL
900 4TH AVENUE SUITE 2000
SEATTLE WA 98164

JOEL B SHIFMAN ESQ
MAINE PUBLIC UTILITIES COMMISSION
STATE HOUSE STATION NO 18
242 STATE STREET
AUGUSTA ME 04333-0018

CHERYL A TRITT
JAMES A CASEY
MORRISON & FOERSTER LLP
SUITE 5500
2000 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20006